


**FILED**

JUN 10 2021

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
PECOS DIVISION**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY  DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS SCOTT PERKINS,

Defendant.

§ NO. P-20-CR-00388-DC

§

§

§

**SUPERSEDING INDICTMENT**

§

§ [COUNT 1: 18 U.S.C. § 2252(a)(2),

§ Distribution of Child Pornography]

§ [COUNTS 2-10: 18 U.S.C. § 2252(a)(5)(B),

§ Possession of Child Pornography]

§

THE GRAND JURY CHARGES:

**COUNT ONE**

**[18 U.S.C. § 2252(a)(2)]**

From September 27, 2019 to October 1, 2019, within the Western District of Texas,  
and elsewhere, the Defendant,

**THOMAS SCOTT PERKINS,**

did knowingly distribute child pornography as defined in Title 18, United States Code, Section  
2256(8)(A) that has been shipped or transported in or affecting interstate or foreign commerce, by  
any means including by computer,

All in violation of Title 18, United States Code, Section 2252(a)(2).

**COUNT TWO**

**[18 U.S.C. § 2252(a)(5)(B)]**

On or about January 9, 2020, in the Western District of Texas, the Defendant,

**THOMAS SCOTT PERKINS,**

did knowingly possess material, specifically a Western Digital hard drive, model number WD800,  
Serial number WD-WCAJ92661471, that contains images of child pornography, as defined in Title  
18, United States Code, Section 2256(8)(A), that involved a prepubescent minor under the age of

12 years, that had been mailed, shipped and transported in interstate and foreign commerce; was produced using materials which had been shipped and transported in interstate and foreign commerce; by any means including by computer;

All in violation of Title 18, United States Code, Section 2252(a)(5)(B).

**COUNT THREE**

**[18 U.S.C. § 2252(a)(5)(B)]**

On or about January 9, 2020, in the Western District of Texas, the Defendant,

**THOMAS SCOTT PERKINS,**

did knowingly possess material specifically a Maxtor hard drive, device model Diamond Max Plus 9 serial number Y45BC9XE that contains images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor under the age of 12 years, that had been mailed, shipped and transported in interstate and foreign commerce; was produced using materials which had been shipped and transported in interstate and foreign commerce; by any means including by computer;

All in violation of Title 18, United States Code, Section 2252(a)(5)(B).

**COUNT FOUR**

**[18 U.S.C. § 2252(a)(5)(B)]**

On or about January 9, 2020, in the Western District of Texas, the Defendant,

**THOMAS SCOTT PERKINS,**

did knowingly possess material specifically a Seagate hard drive, device model ST1000LM049 serial number WGS5QBVZ that contains images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor under the age of 12 years, that had been mailed, shipped and transported in interstate and foreign commerce; was produced using materials which had been shipped and transported in interstate and foreign commerce; by any means including by computer;

All in violation of Title 18, United States Code, Section 2252(a)(5)(B).

**COUNT FIVE**

**[18 U.S.C. § 2252(a)(5)(B)]**

On or about January 9, 2020, in the Western District of Texas, the Defendant,

**THOMAS SCOTT PERKINS,**

did knowingly possess material specifically a Seagate hard drive, device model SRDONF2 serial number NA8EYNL7 that contains images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor under the age of 12 years, that had been mailed, shipped and transported in interstate and foreign commerce; was produced using materials which had been shipped and transported in interstate and foreign commerce; by any means including by computer;

All in violation of Title 18, United States Code, Section 2252(a)(5)(B).

**COUNT SIX**

**[18 U.S.C. § 2252(a)(5)(B)]**

On or about January 9, 2020, in the Western District of Texas, the Defendant,

**THOMAS SCOTT PERKINS,**

did knowingly possess material specifically a Seagate hard drive, device model SRDOPV1 serial number NA9QO2S9 that contains images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor under the age of 12 years, that had been mailed, shipped and transported in interstate and foreign commerce; was produced using materials which had been shipped and transported in interstate and foreign commerce; by any means including by computer;

All in violation of Title 18, United States Code, Section 2252(a)(5)(B).

**COUNT SEVEN**

**[18 U.S.C. § 2252(a)(5)(B)]**

On or about January 9, 2020, in the Western District of Texas, the Defendant,

**THOMAS SCOTT PERKINS,**

did knowingly possess material specifically a Western Digital hard drive, device model WDBYFT0040BBK-OA serial number WX51D961NE27 that contains images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor under the age of 12 years, that had been mailed, shipped and transported in interstate and foreign commerce; was produced using materials which had been shipped and transported in interstate and foreign commerce; by any means including by computer;

All in violation of Title 18, United States Code, Section 2252(a)(5)(B).

**COUNT EIGHT**

**[18 U.S.C. § 2252(a)(5)(B)]**

On or about January 9, 2020, in the Western District of Texas, the Defendant,

**THOMAS SCOTT PERKINS,**

did knowingly possess material specifically a Samsung hard drive, serial number S267J1LZ503188 that contains images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor under the age of 12 years, that had been mailed, shipped and transported in interstate and foreign commerce; was produced using materials which had been shipped and transported in interstate and foreign commerce; by any means including by computer;

All in violation of Title 18, United States Code, Section 2252(a)(5)(B).

**COUNT NINE**

**[18 U.S.C. § 2252(a)(5)(B)]**

On or about January 9, 2020, in the Western District of Texas, the Defendant,

**THOMAS SCOTT PERKINS,**

did knowingly possess material specifically a Simple Tech hard drive, device model 96300-41001-68 serial number 09335092000206005 that contains images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor under the age of 12 years, that had been mailed, shipped and transported in interstate and foreign

commerce; was produced using materials which had been shipped and transported in interstate and foreign commerce; by any means including by computer;

All in violation of Title 18, United States Code, Section 2252(a)(5)(B).

**COUNT TEN**

**[18 U.S.C. § 2252(a)(5)(B)]**

On or about January 9, 2020, in the Western District of Texas, the Defendant,

**THOMAS SCOTT PERKINS,**

did knowingly possess material specifically a Kingston hard drive, device mode Data Traveler DT100 serial number 4185742 that contains images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor under the age of 12 years, that had been mailed, shipped and transported in interstate and foreign commerce; was produced using materials which had been shipped and transported in interstate and foreign commerce; by any means including by computer;

All in violation of Title 18, United States Code, Section 2252(a)(5)(B)

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**

**[See Fed. R. Crim. P. 32.2]**

**Child Pornography Violations and Forfeiture Statutes**

**[Title 18 U.S.C. §§ 2252(a)(2) & (a)(5)(B),  
subject to forfeiture pursuant to Title 18 U.S.C. § 2253(a)]**

As a result of the foregoing criminal violations set forth in Counts One through Ten, the United States of America gives notice to Defendant **THOMAS SCOTT PERKINS**, of its intent to seek the forfeiture of any forfeitable property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. §§ 2253(a)(1)-(3), which states:

**Title 18 U.S.C. § 2253. Criminal forfeiture**

**(a) Property subject to criminal forfeiture.**-A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter or who is convicted of an offense under section 2252B of this chapter, or who is convicted of an offense under chapter 109A, shall forfeit to the United States such person's interest in-

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

This Notice of Demand for Forfeiture includes, but is not limited, to the following:

1. HP MINI LAPTOP SN: CNU92644KF;
2. ACER LAPTOP SN: US680B06692521;
3. ACER CHROME LAPTOP; SN: NXEF38AO115141;
4. DELL LAPTOP WITH THUMBDRIVE ATTACHED; SN: 7D420P2;
5. DELL INSPIRION LAPTOP; SN: 8YPDH61;
6. HP WINDOWS LAPTOP; SN: 8CG9297P66;
7. ACER CHROMEBOOK LAPTOP; SN: NXGE8AW362512BF47600;
8. BLUE DELL LAPTOP FROM BAG IN DR; SN: 51DYQ72;
9. DELL LAPTOP; SN: 65MK1H1;
10. DELL INSPIRION; SN: 7T6BFT1;
11. DELL DESK TOWER; SN: DYHN351;
12. ANTEC DESK TOWER; SN: UNKNOWN;
13. DELL DESK TOWER; SN: 73N8K51;
14. XB0X 360;
15. XBOX;
16. SONY PS3;
17. SONY PS4;
18. XB0X 360;
19. SONY PS3;
20. SONY PS2 W/CARD;
21. NINTENDO 64 PLAYER;
22. SEAGATE HARD DRIVE; ST1000LM014, SN: W380HBC6;
23. SEAGATE HARD DRIVE; ST1000LM049, SN: WGS5QBVZ;
24. APPLE EXTERNAL HARD DRIVE;
25. IOMEGA EXTERNAL HARD DRIVE;
26. SEAGATE EXTERNAL HARD DRIVE; SRDONF2, SN: NA8EYNL7;
27. SIMPLE TECH HARD DRIVE; MODEL 96300-41001-68, SN: 09335092000206005;
28. WESTERN DIGITAL HARD DRIVE, DEVICE MODEL WDBYFT0040BBK-OA, SN: WX51D961NE27;
29. INSIGNIA EXT. HARD DRIVE;
30. AXIMO HARD DRIVE;

31. TOSHIBA HARD DRIVE;
32. ULTRA EXTERNAL HARD DRIVE;
33. XB0X 360;
34. WESTERN DIGITAL WD800 HARD DRIVE, SERIAL #:WD-WCAJ92661471;
35. LAPTOP HARD DRIVE;
36. SEAGATE HARD DRIVE; SRDOPV1; SN: NA9QO2S9;
37. CORSAIR THUMBDRIVE;
38. 2 THUMB DRIVES;
39. 2 THUMB DRIVES;
40. 5 THUMBDRIVES W/MEMORY CARDS;
41. HP THUMBDRIVE;
42. THUMBDRIVE;
43. THUMBDRIVE;
44. HP THUMBDRIVE;
45. SANDISK THUMBDRIVE;
46. 4 THUMBDRIVES W/CARDS;
47. 2 SD CARDS;
48. SD CARD;
49. SD CARD;
50. KODAK CAMERA;
51. SAMSUNG CELL PHONE;
52. ZTE CELL PHONE;
53. 2 CELL PHONES;
54. 3 CELL PHONES;
55. CDR-RW;
56. CDR-RW;
57. MAXTOR DIAMOND MAX PLUS 9 HARD DRIVE, SN: Y45BC9XE;
58. KINGSTON HARD DRIVE, DEVICE MODE DATA TRAVELER, DT100, SN: 4185742;
59. SAMSUNG HARD DRIVE, SN: S267J1LZ503188;
60. Any and all property involved in or used or intended to be used in the commission of the criminal offenses.

A TRUE ~~Bill~~ Original signed by the  
foreperson of the Grand Jury

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FOREPERSON OF THE GRAND JURY

Ashley C. Hoff  
UNITED STATES ATTORNEY

BY:

  
Andrew C. Weber

Assistant United States Attorney